

EXHIBIT 5

In The Matter Of:
Fair Fight Action v.
Raffensperger

Hank Bromley
October 22, 2019

Regency-Brentano, Inc.
13 Corporate Square
Suite 140
Atlanta, Georgia 30329
404.321.3333



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1 A. I don't believe I did.

2 Q. How do you know the people you've
3 described as several black students were students?

4 A. I don't know that for a fact. That's a
5 phrase in the initial draft of the affidavit that I
6 should have corrected had I noticed that.

7 Q. Did you talk to any of the people, these
8 five to ten black people?

9 A. No, I did not. I simply observed their
10 conversations with the poll workers.

11 Q. Do you have any information about these
12 people, again I'm referring to the five to ten black
13 people, besides what you observed them being told by
14 poll workers while you were waiting on Ms. Alexander?

15 A. I observed their own statements to the
16 poll workers, what they were told by the poll workers,
17 and then their actions after their conversation with
18 the poll workers, and that's my full extent of my
19 knowledge about these people.

20 Q. So you don't know whether they were
21 properly registered to vote at that polling precinct,
22 correct?

23 A. That's correct. I know that they asserted
24 that they were registered to vote and that they were
25 told that they were not on the roster. They were

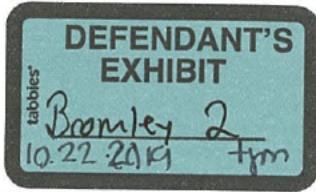
**DECLARATION UNDER PENALTY OF PERJURY
PURSUANT TO 28 U.S.C. § 1746
AND/OR
SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW**

1. My name is Hank Bromley. I am over eighteen years of age and competent to testify to the matters contained herein.

2. I am a resident of Chatham County in Georgia and my residence address is

[REDACTED]

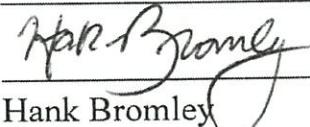
3. My individual circumstances are the following: On election day, I worked as a volunteer giving voters rides to their polling stations. One of my passengers Doris Alexander, experienced great hardship when trying to vote. Specifically, Ms. Alexander applied for an absentee ballot but never received it. When we arrived to the polling location, she was told that because she was already issued a ballot she could not vote unless she had the absentee ballot with her. I asked if she could vote using a provisional ballot. We were told that they did not have any provisional ballots left. A poll worker had asked several hours earlier for more to be delivered; however, none had yet arrived. A poll manager made a call to headquarters to see if they could cancel Ms. Alexander's absentee ballot even though it was not physically present; it took two to three hours to get an answer. Headquarters did successfully cancel Ms. Alexander's absentee ballot, and she was able to vote using the voting machines. Although Ms. Alexander's issues were



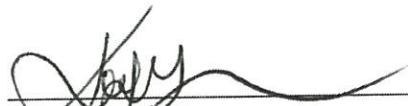
remedied, I noticed that the polling station was located adjacent to Savannah State University, which is a Historically Black University. During my wait, several black students were told they were not on the list of registered voters and were denied access to the voting machines. Some were forced to vote using provisional ballots when additional ballots finally arrived. Others left without voting before the additional ballots arrived.

4. I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.
5. I understand that in giving this Declaration and/or Affidavit, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
6. I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 15th day of November, 2018.


Hank Bromley

Sworn to and subscribed before me
This the 15th day of November, 2018.


Notary Public

